

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Conditional Major Draft Permit No. F-06-001

AMERICA'S FINEST WOODWORKING TEAM

800 ENTERPRISE DRIVE, LEXINGTON, KY

January 13, 2006

SAJJAD QUABILI, REVIEWER

Plant I.D. # 021-067-00165

A. I. #: 37911

**SOURCE DESCRIPTION:**

America's Finest Woodworking Team manufactures wooden store fixtures for retail industry. The source is a custom wood products manufacturer. The plant operations include woodworking and spraying stains, paints and topcoats. In addition, the plant applies laminate to wood surfaces using contact adhesives.

**COMMENTS:**

Currently, the source is operating the fixtures manufacturing with a deferral to obtain a permit under 401 KAR 52:080. Due to recent changes in operation, the source had increased their production of store fixtures. As a result, the actual emissions exceeded the 50% major threshold levels. Consequently, the source has applied for a Conditional Major permit.

America's Finest is potentially major for VOC and HAP emissions. The source has elected to accept federally enforceable limits for both VOC and HAP emissions to become a Conditional Major.

Modeling of the toxic emissions from the source was conducted using SCREEN3. Toxic emission rates were found to be within emission limits set in the permit.

**APPLICABLE REGULATIONS:**

401 KAR 59:010, New process operations, applicable to each affected facility or source associated with process operations, which are not subject to another emission standard with respect to particulate, commenced on or after July 2, 1975.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

America's Finest has requested voluntary permit limits of less than or equal to:

1. 90.0 tons per year of volatile organic compounds (VOC)
2. 9.0 tons per year of individual hazardous air pollutant (HAP)
3. 22.5 tons per year of combined HAPs.

**PERIODIC RECORDKEEPING:**

- a. Monthly records shall be kept of all adhesives, stains, sealers, thinners, and clean-up solutions used, including the type, amount, VOC content by weight percent, less any water and/or exempt solvent.
- b. Monthly records shall be kept of all materials containing HAP(s) used for the above affected facilities, including the product type, amount used and weight percentages of all individual HAPs.
- c. VOC and HAP emissions shall be calculated monthly, and every month, a new 12-month

- rolling total for VOC and HAP emissions shall be calculated.
- d. All records shall be retained by the source for a period of five years.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.